

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS	
FILED	
APR 12 2022	
CLERK, U.S. DISTRICT COURT	
No. 4:22-MJ-265	By _____ Deputy

UNITED STATES OF AMERICA

v.

KEIDRIC KEI VON BROWN (01)

No. 4:22-MJ-265 By \_\_\_\_\_ Deputy

**CRIMINAL COMPLAINT**

**Alleged Offense:**

I, Task Force Officer B. Cline, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

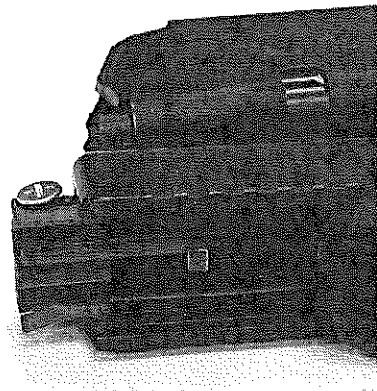
On or about January 17, 2022, in the Fort Worth Division of the Northern District of Texas, defendant **KEIDRIC KEI VON BROWN**, did knowingly and unlawfully possess a firearm which was not registered to him in the National Firearms Registration and Transfer Record, to wit: a machine gun, described as a Glock, model 17, 9mm caliber pistol, bearing serial number BPVS480, with an unregistered Glock selector switch attached, in violation of Title 26 U.S.C. §§ 5861(d) and 5871.

**Probable Cause:**

I, Task Force Officer B. Cline, affiant, under oath, duly state that I am a sworn Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, assigned to the Dallas Field Division, Group II, and a Detective assigned to the Arlington Police Department Violent Crime Unit. The statements set forth in this affidavit are true and correct to the best of my knowledge and belief but are not inclusive of all the evidence or information in the case.

1. On or about January 17, 2022, at approximately 2312 hours, an Arlington Police Department (APD) Officer was conducting traffic enforcement at 300 West Division Street in Arlington, Texas when the officer observed a gray Chrysler 200 driving slowly. The gray Chrysler 200 had Texas license plate PCR3709 attached. The APD officer queried the license plate and realized the vehicle insurance was expired. The APD officer initiated a traffic stop on the gray Chrysler 200 due to the insurance showing as expired.

2. The suspect vehicle stopped and the APD officer approached the driver door of the vehicle. Upon arriving at the vehicle, the APD officer could smell the odor of marijuana coming from within the vehicle, so another APD unit was requested. The driver was identified as **Keidric BROWN**, and the front seat passenger was identified as Laquincea Flournoy. After the APD officer queried both subjects for warrants, **BROWN** was discovered to have a confirmed felony warrant for aggravated robbery from Tarrant County. **BROWN** was asked by the APD officer to step out of the driver's seat of the vehicle to be detained on the warrant. Flournoy also exited the vehicle and was detained until the APD officer finished a probable cause search of the Chrysler 200.
3. During a probable cause search of the vehicle due to the odor of marijuana, a Glock, model 17, 9mm caliber pistol, bearing serial number BPVS480 was discovered under the driver's seat where **BROWN** had been sitting. The pistol contained a high-capacity extended magazine that extended well below the grip of the firearm and was loaded with thirty-one (31) 9mm rounds of ammunition. A red plastic Glock switch was attached to the rear of the Glock's slide. A Glock switch is a machine-gun conversion device that is designed to make the Glock pistol function as a fully automatic firearm by allowing it to shoot, automatically, more than one bullet, without manual reloading, by a single function of the trigger. The high capacity magazine attached to the pistol is consistent with the use of a Glock switch in a fully-automatic fashion to allow the user to discharge numerous rounds rapidly. Pictures of the pistol, magazine, and Glock switch are below. In addition to the firearm, officers located in the vehicle a glass jar with marijuana residue and a scale with marijuana residue.

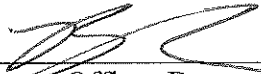


4. On or about January 18, 2022, Affiant function tested the Glock with the APD Firearm Range Officer and it functioned consistent with a fully-automatic weapon. Furthermore, on February 25, 2022, an ATF Firearms Enforcement Officer examined and test fired the Glock, model 17, 9mm caliber pistol, bearing serial number BPVS480, with the Glock switch attached, and observed that the weapon fired automatically more than one shot, without manual reloading, by a single function of the trigger. The ATF Firearms

Enforcement Officer determined the Glock switch by itself, and the Glock, model 17, 9mm caliber pistol, bearing serial number BPVS480 with the Glock switch attached, constituted machine guns and firearms as defined in 26 U.S.C. § 5845(b). Accordingly, these items require proper federal registration (tax stamp) and payment of the appropriate tax in order to be possessed.

5. On or about January 19, 2022, a query of the National Firearms Registration and Transfer Record database for **BROWN** showed **BROWN** does not have any NFA firearms, to include machineguns, registered to him.
6. On or about January 31, 2022, a completed ATF Firearms Trace Summary showed the Glock, model 17, 9mm caliber pistol, bearing serial number BPVS480 (not including a Glock switch) was purchased by **BROWN** on September 18, 2020, at an Academy Sports + Outdoors.
7. Affiant reviewed cellular data that was extracted from **BROWN**'s iPhone that **BROWN** possessed when **BROWN** was arrested by APD officers. Within the cellular data, Affiant located conversations about a Glock switch on or about December 21, 2021.

Based upon the above facts and circumstances, I respectfully submit that there is probable cause to believe that **KEIDRIC KEI VON BROWN**, did knowingly and unlawfully possess a machinegun, namely, a Glock, model 17, 9mm caliber pistol, bearing serial number BPVS480, with an unregistered Glock selector switch attached, which is not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26 U.S.C. §§ 5861(d) and 5871.

  
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Task Force Officer Bryan Cline  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

SWORN AND SUBSCRIBED before me this 12<sup>th</sup> day of April, 2022, at  
1:25 a.m./6 p.m. in Fort Worth, Texas.

  
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JEFFREY L. CURETON  
UNITED STATES MAGISTRATE JUDGE